

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

THOMAS J. MURRER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

WELLS FARGO BANK, N.A.,

Defendant.

Case No. 3:24-cv-49

**DEFENDANT WELLS FARGO BANK, N.A.'S
MOTION TO COMPEL ARBITRATION**

Defendant Wells Fargo, N.A. (“Wells Fargo”) moves this Court for an order compelling Plaintiff Thomas J. Murrer (“Plaintiff”) to arbitrate his claims against Wells Fargo pursuant to the terms of the parties’ agreements to arbitrate and the Federal Arbitration Act, 9 U.S.C. § 1, *et seq.*, (“FAA”), as the parties have enforceable agreements to arbitrate, and any issues of arbitrability have been clearly delegated to the arbitrator. As such, this matter should be dismissed.

The bases for this Motion are set forth in the memorandum in support filed contemporaneously with this Motion. For the reasons in the memorandum, Wells Fargo respectfully requests that its Motion be granted and that the parties be compelled to arbitration.

Dated: March 25, 2024

Respectfully submitted,

MCGUIREWOODS LLP

/s/ Katherine E. Lehn

Katherine E. Lehn (VSB No. 92357)

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*Attorneys for Defendant
Wells Fargo Bank, N.A.*

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2024, I caused the foregoing document to be filed with the Clerk of the Court and served upon on all counsel of record via the Court's CM/ECF system.

/s/ Katherine E. Lehn

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